

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DROPLETS, INC.,

Plaintiff,

V.

**OVERSTOCK.COM, INC.,
SEARS ROEBUCK & CO.,
SEARS BRANDS LLC,
SEARS HOLDINGS CORPORATION.**

Defendants.

§ 100.000

Civil Action No. 2:11-cv-401

JURY TRIAL

DEFENDANTS' SECOND AMENDED OBJECTIONS TO PLAINTIFF DROPLETS'
OBJECTIONS TO COUNTERS AND REBUTTAL DESIGNATIONS TO DEFENDANT'S
OBJECTIONS AND COUNTER DESIGNATIONS OF JANUARY 7, 2015

Pursuant to the Court's Docket Control Order (dkt. 175) entered on January 6, 2014, Defendants' hereby provide its second amended objections to Plaintiff's objections and rebuttal designations to Defendants' objections and counter deposition designations served on January 7, 2014. Defendants reserve the right to modify these objections depending upon the parties' discussions of the issues and the Court's rulings on motions and evidentiary issues, or if Defendants otherwise deems it appropriate to do so.

Deposition of Amit Goyal, July 24, 2014

From (page:line)	To (page:line)	Objections	Counter-Designations	Objections to Counters	Rebuttal designations
5:6	5:8				
7:22	7:25				
60:15	60:18				
61:18	62:1	LC, F, O, U, V OB (61:21)			

From (page:line)	To (page:line)	Objections	Counter-Designations	Objections to Counters	Rebuttal designations
69:22	70:1	LC, F, H, O, U, V OB (69:25)			

Deposition of Veera Chandra Sekhar Kovelakuntla, July 31, 2014

From (page:line)	To (page:line)	Objections	Counter-Designations	Objections to Counters	Rebuttal designations
8:13	8:15				
18:15	18:18				
88:23	89:6				
90:23	91:15				
92:24 94:20	92:25 95:22				
107:18	107:25				
130:16	130:20				
177:21	178:5				
215:4	215:25				

Deposition of Seth Alan Moore, July 23, 2014

From (page:line)	To (page:line)	Objections	Counter-Designations	Objections to Counters	Rebuttal designations
6:10	6:12				
11:18 12:8	12:3 12:9				
24:18	25:25				
25:19	26:6				
75:17	75:23				
113:13	114:18				
139:1	139:9				
140:4	140:10				

Deposition of Seth Alan Moore, November 7, 2014

From (page:line)	To (page:line)	Objections	Counter- Designations	Objections to Counters	Rebuttal designations
85:17	85:19				
85:21	85:23				
105:20	105:22				
115:23	116:12				
129:15	129:17				
133:14	133:16				
134:16	134:17				
134:18	134:20				
135:10	135:15				

Deposition of Rongkai (Alfred) Zhao, August 5, 2014

From (page:line)	To (page:line)	Objections	Counter- Designations	Objections to Counters	Rebuttal designations
9:18	9:19				
13:24	14:19				
93:9 96:8	93:14 97:7				
97:21 101:4	98:3 101:11				
103:3	103:12				

DATED: January 8, 2015

Respectfully submitted,

BRACEWELL & GIULIANI LLP/s/ John H. Barr, Jr.

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SEARS HOLDINGS CORPORATION**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document on this 8th day of January, 2015, via electronic mail.

/s/ John H. Barr, Jr.